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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

FREDDY ADAN GRACIA,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 1:24-cv-00441-KES-BAM

STIPULATION AND ~~PROPOSED~~ ORDER
FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 45 days, from April 14, 2025, to May 29, 2025, for the Commissioner to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is the Commissioner's first request for an extension of time. Plaintiff does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to ongoing staffing fluctuations and organizational changes, counsel for the Commissioner has been tasked with additional duties including serving as a

jurisdictional coordinator, reviewing other attorneys' work, training and mentoring other attorneys, and handling more cases, including the instant case, which was just reassigned to her. Despite diligent efforts to manage her workload, counsel for the Commissioner needs additional time in the instant case to review the substantial administrative record, consider the issues and arguments in Plaintiff's oversized brief, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: April 8, 2025

PENA AND BROMBERG, PC

By: /s/ Jonathan O. Pena*

JONATHAN O. PENA

Attorneys for Plaintiff

[*As authorized by e-mail on Apr. 8, 2025]

Dated: April 9, 2025

MICHELE BECKWITH

Acting United States Attorney

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Office of Program Litigation, Office 7

By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, and cause appearing, IT IS ORDERED that the Commissioner's Cross-Motion for Summary Judgment shall be due on May 29, 2025, and Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

IT IS SO ORDERED.

Dated: April 9, 2025

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE